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July 11, 2025

Honorable Hector Gonzalez
United States District Judge
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Uribe v. Elahi LLC et al. **24-cv-07182**
(CLP)

Your Honor,

Plaintiff would respectfully request an order compelling the Defendants to respond to Plaintiff's Discovery Demands.

Plaintiff served Defendants with Requests for Documents and Interrogatories on May 5, 2025 in compliance with the Rule 16 Case Management Schedule.

Defendants have not provided responses to any of those demands nor provided their Rule 26 Disclosures. We had agreed to exchange responses on June 5, 2025.

Plaintiff has provided her responses to Defendants demands as well as her Rule 26 Responses.

Plaintiff has raised the issue with Defendants' counsel on several occasion including but not limited to in person on June 17, 2025 as well as by phone on July 7, 2025.

Defendants claim that they need more time to respond because the Defendant has been out of the country. Discovery ends on July 21, 2025.

Respectfully Submitted,

/s/ Colin Mulholland, Esq.